

**Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D. C. 20554**

In the Matter of)	
)	
Amendment of Parts 2 and 25 to Implement)	IB Docket No. 99-67
the Global Mobile Personal Communications)	
by Satellite (GMPCS) Memorandum)	
of Understanding and Arrangements)	
)	
Petition of the National Telecommunications and)	RM No. 9165
Information Administration to Amend Part 25 of)	
the Commission's Rules to Establish Emissions)	
Limits for Mobile and Portable Earth Stations)	
Operating in the 1610-1660.5 MHz Band)	

COMMENTS OF THE UNITED STATES COAST GUARD

The United States Coast Guard (Coast Guard) respectfully submits these Comments in response to the Notice of Proposed Rulemaking (Notice) RM-9165 released March 5, 1999 in the above-captioned proceeding. These comments address distress and safety communications and E-9-1-1 requirements as requested by the Commission. The Coast Guard will not address other issues in this proceeding, as its views on those issues have been coordinated with other federal agencies through the Interdepartmental Radio Advisory Committee, and incorporated in the National Telecommunications and Information Administration's (NTIA) comments to the Commission.

Introduction

1. The Coast Guard operates 56 centers throughout the United States, plus similar centers

outside the country, to respond to maritime emergencies. These centers maintain emergency telephone numbers to allow people to report overdue vessels, observed boaters in distress, or other emergencies. During fiscal year 1997, the Coast Guard assisted 74,740 people and saved 3,836 lives. We also received over 40,000 emergency calls over a variety of different telecommunications systems that year. The property assisted was valued at nearly 1.8 billion dollars. In fiscal year 1992, the Coast Guard received 706 suspected hoax calls, 15 of which were confirmed; those confirmed calls cost the taxpayer \$2,618,125.

2. Mariners use a variety of telecommunications systems for sending emergency calls to the Coast Guard. Most such calls are over government-operated systems, such as the VHF National Distress System, the COSPAS-SARSAT satellite system, or systems recognized by the International Maritime Organization's (IMO's) Global Maritime Distress & Safety System (GMDSS). However a large and growing number of emergency calls are received over cellular telephone systems¹. As other wireless systems become available, we expect a large number of emergency calls to be sent over those systems. In recognition of the public demand for such a capability, Coast Guard regulations (46 CFR 28.245(c) and (d)) allow commercial fishing industry vessels to carry cellular or unspecified satellite communications equipment to meet Congress' mandate that these vessels carry radiocommunications equipment². It is essential that either all of these

¹ In fact, many carriers have added a maritime safety feature, whereby calls initiated by "*CG" are automatically routed to the nearest appropriate Coast Guard Group or Activity Operations Center. This "*CG" service has been well advertised in the maritime community and its use is common.

² See Commercial Fishing Industry Vessel Safety Act (46 USC Sections 4501-08). Section 4502, Safety Standards, provides that:

(a) The Secretary shall prescribe regulations which require each vessel to which this chapter applies shall be equipped with ...

(7) alerting and locating equipment ... on vessels that operate on the high seas...

wireless systems provide a reliable and efficient means of alerting and communicating with a rescue coordination center (RCC) in an emergency, or that those incapable of providing such a service clearly indicate that limitation to its potential customers.

3. With the increasing use of cellular mobile telephones by mariners for Coast Guard emergency assistance and the potential proliferation of other wireless mobile systems that will be used by mariners for making emergency calls, Coast Guard command centers must rely on a GMPCS mobile system's capability to provide information to enable them to identify and locate callers needing assistance, and to assist in the prosecution of hoax callers. Additionally, users will expect equivalent procedures for emergency calling from GMPCS phones as they do for other Commercial Mobile Radio Service (CMRS) wireless and wireline phones. If no rules or different emergency calling rules are established for MSS providers, this may lead to confusion and the possibility of emergency calls not being forwarded to the correct emergency response agency.

(b) (1) In addition to the requirements of subsection (a) of this section, the Secretary shall prescribe regulations requiring the installation, maintenance, and use of the equipment in paragraph (2) of this subsection for documented vessels to which this chapter applies that...

Cont. (2) The equipment to be required is as follows:

(A) alerting and locating equipment...

(D) radiocommunications equipment sufficient to effectively communicate with land-based search and rescue facilities; ... and ...

(G) other equipment required to minimize the risk of injury to the crew during vessel operations, if the Secretary determines that a risk of serious injury can be eliminated or mitigated by that equipment.

The Commandant of the Coast Guard prescribes these regulations. 46 CFR 28.10.

4. The National Search and Rescue Committee (NSARC), formerly the Interagency Committee on Search and Rescue (ICSAR), is a federal interagency standing committee chartered to oversee the National Search and Rescue Plan, coordinate development of interagency policies and positions on SAR matters, provide and interface with other national agencies involved with emergency services, and provide a forum for coordinated development of compatible procedures and equipment to increase the effectiveness and standardization of SAR operations. The NSARC Commercial Mobile Satellite Services Working Group (CMSS) was formed to enable the MSS providers to better understand the needs of Search and Rescue (SAR) and Disaster Support (DS) operations and to gather information and understanding from MSS providers that could be used by the SAR and DS community to fulfill their communications needs in the future. The CMSS Group is composed of representatives of the government agencies involved in SAR, MSS providers, and other relevant organizations. With the cooperation of 13 current and future MSS providers, the CMSS developed a “Search and Rescue and Disaster Support MSS Capabilities Comparison Paper” (Capabilities Paper) to identify the current and future operational capabilities of MSS operators that the SAR and DS communities believe to be essential to support SAR and DS operations. This paper should prove useful to the Commission in this proceeding and is attached as enclosure 1.

Distress and Safety Communications and E-9-1-1 Requirements

5. The Commission asks a number of important questions related to GMPCS and E-911 of interest to the Coast Guard. (1) It requests comment on whether to require GMPCS terminals authorized for use in the United States to have position location capabilities. If so, it asks if the 125-meter RMS standard applicable to terrestrial systems should be used or should a different criterion be established for MSS systems? (2) It seeks comment on whether it should require GMPCS systems to implement their systems with enhanced 9-

1-1 capabilities. (3) It also seeks comment on how the location accuracy requirement of Phase I would be applied, or would a Phase II-type requirement be more appropriate or practicable. (4) Finally, it asks if automatic number identification (ANI) can be provided by MSS systems. Responses to the questions above are contained in sequential order in the following pages.

Should GMPCS terminals have position location capabilities? If coordinates are to be provided, can the 125-meter RMS standard be used or should a different criterion be established?

6. As many commenters and petitioners that have Petitioned for Waiver of Section 20.18(e) of the Commission's Rules for E-911 (CC Docket No. 94-102) have noted, "In the three years that have passed since CTIA and three public safety associations filed the original Consensus Agreement with the Commission, there have been dramatic developments in both network and handset-based location technologies."³ For example, it has been noted that "there have been a number developments to other solutions, particularly handset based solutions using Global Positioning Satellite ("GPS") technology."⁴ It is also stated that "there are indications that ALI-enabled handsets may be commercially available well in advance of the current Phase II compliance deadline."⁵ AT&T also believes that handset based technology may be the best solution in the long run for many applications⁶. An ALI vendor has indicated that more than 16 manufacturers are also currently proceeding with prototypes that integrate GPS into handsets for the provision of ALI information⁷. Clearly, a handset approach for the purpose of delivering ALI information is soon to become a reality, at least for cellular networks. Correspondingly, most Mobile

³ CTIA Comments at 2

⁴ Airtouch Comments at 4

⁵ *ibid*

⁶ AT&T Comments at 2

⁷ SnapTrack Press release at 1

Satellite Systems which are either currently on-line or which are planning to go on-line in the near future are capable of obtaining position accuracy within 125 meters as required in Phase II of the FCC's E-911 Order. Many of these MSS providers are using GPS contained in the handset to obtain location accuracy. The Coast Guard therefore submits that the Commission should require all such systems to have position location capabilities using a criterion at least as accurate as the 125-meter RMS standard.

Should the FCC require that GMPCS systems implement their systems with enhanced 9-1-1 capabilities?

7. At a minimum, in order to accomplish Coast Guard rescue missions without delay and to prosecute hoax calls when they do occur, any wireless system should be capable of providing the following information to the Public Service Answering Point (PSAP) or Local Exchange Carrier in the delivery of emergency calls:

Location of the call's origin

Mobile transmitter subscriber's name

Mobile transmitter subscriber's call back number

Priority of the call

Routing information

8. This information is important for two reasons. First, Coast Guard rescue coordination centers must know the identity of a person in a maritime emergency situation or reporting a maritime emergency, so that we can respond quickly with rescue facilities and call back that person if communications are lost. Second, we receive a growing number of hoax

calls by telephone, each of which costs the taxpayer in reduced availability of Coast Guard resources for responding to actual distress calls, and thousands of dollars in fuel for unnecessary use of helicopters, boats, and other resources. We will depend increasingly on the capability to identify the hoax caller for prosecution purposes and discourage others from making such calls.

9. The CMSS Capabilities Paper helps to identify which of the 13 MSS providers may or plan to provide the 5 essential items of information listed above. The items listed are not only essential, as indicated in the Capabilities Paper many of these capabilities are currently or will be implemented in the various systems listed. In order for these capabilities to be made useful to aid the public however, regulation is required to mandate compatibility standards for these functions and operations.
10. **Location of the call's origin:** Location accuracy is essential in SAR cases. Without it, the Coast Guard would have to depend on the location information conveyed by those actually in distress; experience shows this will often be inaccurate. A much better solution would be for ALI from the handset to provide the location. As discussed earlier, GPS-based handset technology has developed substantially.
11. **Mobile transmitter subscriber's name:** Essential to the rescue effort and as an aid in the prosecution of hoax call cases.
12. **Mobile transmitter subscriber's call back number:** This function is essential for the Coast Guard to be able to contact the caller if the initial connection is severed, and as an aid in hoax call cases.
13. **Priority of the call:** This function may used to determine the priority of a call and help

to identify distress emergencies immediately. It may be also used as a tool for preemption of other calls to ensure distress or emergency priority calls are completed.

14. **Routing information:** It is essential that distress calls from MSS users be forwarded efficiently and quickly to the applicable PSAP.

How should the accuracy location requirement of Phase I be applied? Or, would only a Phase II-type requirement be more appropriate or practicable for MSS systems?

15. In order for the Coast Guard to make use of location in SAR situations, Phase II accuracy is mandatory. If the accuracy obtained was comparable to Phase I requirements the Coast Guard would need to search over many square miles which may result in rescue delays or no rescue at all.

Can automatic number identification (ANI) be provided by MSS systems?

16. As stated earlier, this is an essential component of an E-911 system for the Coast Guard to have call back capability and to aid in identifying hoax callers.

Applicability of Proposed Compatibility Requirements

17. While the majority of GMPCS two-way systems will provide only voice communications, some of the systems soon to be deployed will provide a data-only service, and others will provide both voice and data. Many customers of data-only services will be using these terminals aboard ship and may need to use them in times of distress. Therefore, we believe that any proposed compatibility requirements should apply to all two-way wireless voice and data systems which fall under the classification of GMPCS.

18. Provisions do not yet exist for automatically forwarding emergency calls from store-and-forward data systems, such as the small LEO satellite systems, to a PSAP or RCC. Until these problems are resolved, we propose that such carriers provide persons who will ensure that appropriate PSAPs or RCCs are notified of emergency messages when they are received by the carrier. In implementing the Global Maritime Distress and Safety System, the International Maritime Organization prepared "Criteria for Use when Providing Inmarsat Shore-based Facilities" for use in the GMDSS to address reliability of delivering emergency messages over store-and-forward satellite systems. We propose these criteria, attached hereto as Enclosure 2, be considered in this proceeding.

Wireless Systems That Provide International Access

19. We note that some of GMPCS systems will provide international access, and therefore should be subject to compatibility requirements similar to those proposed in this Notice for domestic providers. A U.S. mariner, for example, navigating outside of U.S. waters within a provider's known coverage area may attempt to use his mobile radio for emergency calling to a foreign emergency service provider and may be unable to get assistance immediately because of the nonexistence or lack of international compatibility standards. Similarly, a foreign mariner using a wireless system licensed by a foreign government may have the same difficulty in U.S. waters. The International Maritime Organization is currently working to resolve mobile satellite international access for emergency calls from ships over mobile satellite. See enclosure 2.

20. We request that the Commission closely coordinate the adoption of its compatibility requirements and standards with international regulatory bodies, such as the International

Telecommunications Union Sector for Radiocommunications, Study Group 8, as well as the ITU Sector for Telecommunications, to ensure the adoption of standards that will allow these wireless systems to transmit ALI, ANI, priority, and routing information that will be decoded by emergency service providers in this and other countries.

Wireless Service Provider Coverage Areas

21. The Notice does not address the issue of coverage as it relates to the geographic areas where a wireless service provider would make its emergency features available. This is a very important issue for the Coast Guard, especially in the case of a mobile satellite system providing service to a portion of, or all, of an ocean area. Similarly, a cellular radio telephone service provider may only guarantee coverage several miles from shore. For example, neither our inspectors nor mariners using non-maritime wireless communications equipment complying with the requirements of 46 CFR 28.245 have any definitive way of knowing if these systems will work in the vessel's intended operating area. Some of the LEO proponents, for example, may not intend to provide service coverage to certain ocean areas for economic reasons.

22. We propose that the service provider make available to its customers and the FCC the geographical areas over which it intends to provide emergency calling features. Additionally, service providers should similarly report all changes in their geographical service areas, whether temporary or permanent. This information is essential to the mariner who travels into an ocean area not covered by the service he or she subscribed to, and would strongly suggest use of an alternate means of emergency calling.

Basic Connectivity

23. Users of existing satellite communications systems, such as Inmarsat land mobile systems, have no means of contacting a PSAP, even by dialing 911, except by going

through a service provider operator at the land earth station. If the provider's land earth station were automated and an operator were not available on a 24 hour basis, users would have no means of reaching a PSAP in an emergency. We suspect this problem may also exist with operational or planned satellite systems. The Coast Guard believes it to be absolutely essential that every mobile satellite system provide a means of reaching a PSAP in an emergency on a 24 hour basis. Because of our unique responsibility to accept emergency calls from outside the local 911 area, from any mobile or mobile satellite service, and from out of state, we must rely on emergency numbers over public switched lines.

Labeling

24. The Coast Guard requests that all consumer wireless equipment have full E-911 capability. If the Commission does not agree, then at a minimum, any consumer wireless equipment that is not capable of providing an emergency calling function should be labeled to clearly indicate that the equipment cannot be used for emergency purposes.

Availability

25. The FCC has previously proposed that **"a user have the ability to reach emergency services from any service initialized mobile radio handset in a home service area or a subscribed-to roamed service area by dialing only 911"**⁸. We concur, and recommend such service be available in any compatible service area.

Summary

26. It is essential that all two-way wireless voice and data systems falling under the

⁸ NPRM CC Docket 94-102

classification of GMPCS provide a reliable and efficient means of calling and communicating with a rescue coordination center in an emergency. Failing that, those systems incapable of providing such a service must clearly indicate that limitation to its customers.

27. Any wireless system should be capable of providing the following information to the PSAP or local exchange carrier in the delivery of emergency calls:

- Location of the call's origin
- Mobile transmitter subscriber's name
- Mobile transmitter subscriber's call back number
- Priority of the call
- Routing information

28. The proposed compatibility requirements should apply to all two-way wireless voice and data systems, which fall under the classification of GMPCS that intend to incorporate emergency calling features in their user terminals.

29. The Coast Guard proposes that carriers providing store-and-forward services provide persons who will ensure that appropriate PSAPs or rescue centers are notified of emergency messages when they are received by the carrier, and that the attached IMO criteria be considered in addressing reliability of delivering emergency messages over store-and-forward satellite systems.

30. The Coast Guard requests that the Commission closely coordinate the adoption of its compatibility requirements and standards with International Regulatory bodies.

31. The Coast Guard proposes that every service provider make available to its customers

and the FCC the geographical areas over which it intends to provide emergency calling features. Additionally, service providers should similarly report all changes in their geographical service areas, whether temporary or permanent.

32. The Coast Guard believes it to be absolutely essential that every mobile satellite system provide a means of reaching a PSAP in an emergency on a 24 hour basis.
33. The Coast Guard believes that any consumer wireless equipment that is not capable of providing an emergency calling function should be labeled stating that the equipment cannot be used for emergency purposes.

Respectfully Submitted,

Joseph D. Hersey, Jr.
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By Direction of the Commandant

Commandant (G-SCT-2)
United States Coast Guard
Washington, D.C. 20593-0001

Enclosures:

- (1) Search and Rescue and Disaster Support MSS Capabilities Comparison Developed By

the ICSAR CMSS Working Group

(2) IMO Criteria for Use when Providing Inmarsat Shore-based Facilities

Attachment 1

Search and Rescue and Disaster Support MSS Capabilities
Comparison Developed by the ICSAR CMSS Working Group

**SEARCH AND RESCUE
DISASTER SUPPORT
MSS CAPABILITIES COMPARISON
DEVELOPED BY THE**

ICSAR CMSS WORKING GROUP

April 1, 1999

April 1 1999

SEARCH AND RESCUE AND DISASTER SUPPORT MSS CAPABILITIES COMPARISON DEVELOPED BY THE ICSAR CMSS WORKING GROUP

A. BACKGROUND AND INTRODUCTION

The Interagency Committee on Search and Rescue (ICSAR) Commercial Mobile Satellite Services Working Group (CMSS) was formed to enable the MSS providers to better understand the needs of Search and Rescue (SAR) and Disaster Support (DS) operations and to gather information and understanding from MSS providers that could be used by the SAR and DS community to fulfill their communications needs in the future. The scope of SAR considered by the CMSS includes Aeronautical, Maritime, Wilderness and Urban SAR areas. Urban SAR, as considered in this effort, is limited to the initial response following such disasters as earthquakes and floods.

The purposes of this paper are to: (1) identify operational capabilities that the SAR and DS communities believe to be essential to support SAR and DS operations; and (2) allow MSS operators

with an opportunity to indicate which of these capabilities they either are providing in existing MSS systems or are planning to provide and when.

This document has been prepared from the perspective of the US domestic search and rescue and disaster support operations. Terms used and defined in this document apply to the aeronautical, maritime and land mobile services and may conflict with international protocol and/or standards for distress alerting. Unlike the aeronautical and maritime services, there is no international recognition of distress alerting in the land-mobile service.

The primary objective of Table 1, Distress Alerting and Locating, is to list the MSS capabilities that should be available for persons in distress to summon help in life threatening situations. The primary objective of Table 2, Post Alert MSS Capabilities, is to list the MSS capabilities that should be available to the responders for operational purposes in the execution of a rescue.

B. TABLE 1: DISTRESS ALERTING AND LOCATING

The element of time in rescuing persons from life threatening distress incidents is obviously the main consideration in the design and operation of a distress alerting system. The first receipt of information by the SAR system of an actual or potential distress initiates the SAR effort. The alert must not only be received by the satellite in a timely manner, but it must also be transmitted to the SAR agency (usually a Rescue Coordination Center (RCC)) or other point of contact responsible for the SAR response. The alert message should include the location of the distress, the identification of the distressed party, and points of contact for the transmitter's owner. The scope of SAR activity for Distress Alerting and Locating includes the Aeronautical, Maritime and Wilderness areas.

Table 1 summarizes the MSS capabilities for Distress Alerting and Locating, either available now or planned in the near future. Tables 1A, 1B and 1C present matrices summarizing the responses to a questionnaire completed by the various MSS providers. The definition of each capability addressed in the Distress Alerting and Locating matrix is given in Attachment 1.

C. TABLE 2: POST ALERTING PHASE CAPABILITIES

The post-alert matrix is intended to address the potential solutions for MSS systems to support SAR and disaster response operations. The scope of SAR response considered by the CMSS in the Post Alerting phase are the Aeronautical, Maritime, Wilderness and Urban SAR Areas.

A difficult problem often encountered in SAR and disaster response operations is the limitation of current communications support systems. Problems with interoperability restrict the ability of police to talk to firemen, local government personnel to talk to federal agency personnel, etc. The limited range of some systems doesn't allow SAR forces in the field to reach their headquarters. Blockage from terrain can limit communications between elements of a SAR force. These and other communications problems are often cited by emergency response personnel as limiting their effectiveness in SAR operations and in disaster support operations. The MSS systems, by their ubiquitous nature, should offer solutions to many if not all of these problems.

Table 2 summarizes the MSS capabilities in the post-alerting phase of SAR and Disaster Response operations. These capabilities are intended for the use of emergency responders in SAR and disaster situations. Tables 2A, 2B and 2C present a summary of the responses to the questionnaire received from the various providers. The definition of each capability addressed in the Post Alerting Phase is given in Attachment 2.

D. DESCRIPTION OF EACH MSS SYSTEM

Each MSS provider was invited to submit a one page description of its system, highlighting the unique aspects of the system and its ability to support SAR and DS operations. These descriptions are included in Attachment 3. For those MSS Providers whose information was not received, a listing of Web pages is included.

ATTACHMENT 1
DESCRIPTION OF CAPABILITIES LISTED
FOR
DISTRESS ALERTING AND LOCATING MATRIX

1. 2-WAY DATA OR 2-WAY VOICE

This is intended to mean digital data transmitted and received via a data line or a voice link could also be used to transmit digital data. For voice, this does not limit the transmission method, which could be either analog or digital.

2. PSTN OR PSDN COMPATIBLE

For voice and data, the gateway or control center of the satellite system should provide compatibility with the PSTN and/or the PSDN, as appropriate. The intent is to avoid having to install unique terminal equipment in the PSAP or SAR facility.

3. EMERGENCY MESSAGE CAPABILITY/ROUTING MEANS

A method of directing an emergency message to the response center responsible for the distress call area, such as a 911 Public Safety Answering Point (PSAP) or a Rescue Coordination Center (RCC). The message may be routed either automatically or via operator assistance.

4. DATA MESSAGE CONFIRMATION

An alert given by voice automatically receives a confirmation when the call is received. For data messages, provisions should be made in the system such that the party in distress is given an audible or visual indication that an appropriate responsible person has received their distress call. This capability will enhance the “will to live” of survivors.

5. DATA MESSAGE ACCOUNTABILITY

This refers to data messages only. Message accountability is required to ensure that distress messages are received by the responsible RCC or PSAP and not lost somewhere in the system.

6. CALL BACK CAPABILITY

The ability to restore communications with another party when communications are lost. This does not imply automatic restoration of communications. A telephone number or data address is required.

7. CONNECTIVITY

Connectivity is achieved by using the location of the distress call and situation information when available. This capability allows the routing of distress calls with minimum delay. If this capability were not available the service provider would be responsible for routing of distress calls.

- A. Connectivity of a voice call to a responsible party such as a PSAP. For voice systems this refers to the ability to determine which local 911 service covers the location of the user terminal using methods such as geographical sorting and situation sorting.
- B. Connectivity of a data message to a responsible party, such as an RCC. This refers to the ability to determine whether the call is a maritime, aeronautical or other emergency in a remote area, and then to connect to an RCC or other responsible party appropriate to that call type and to the location of the caller.

8. POSITION AVAILABLE AT RCC OR PSAP

- A. This capability will allow the RCC or PSAP to know the position of the unit identified by its registration number. This feature may be optional; thus, not available in all Automatic Location Identification (ALI) compatibility is required for calls made to a 911 service provider. This information is necessary to plan the response to the distress call.
- B. If position is not available to the RCC at this time, will it be available in the future, and if so, when?

9. POSITION ACCURACY: 125m (2d rms. or 95%)

- A. POSITION ACCURACY – This refers to the accuracy of the position specified in Item 8. In the notification phase, the position accuracy should allow the routing of the distress call to the proper PSAP or RCC. In the notification phase the position accuracy should allow the routing of the distress call to the proper PSAP or RCC. In the rescue phase the position location should be sufficiently accurate to allow "pinpointing" of the distress victims to allow

rescue operations to take place. "Pinpointing" can be accomplished by other than precise location so that rescue can be accomplished successfully (e.g. homing). Two-way communications with the victim(s) may provide another method of pinpointing, however, the reliance on this method alone is highly controversial. The accuracy should be a 2d rms. or 95% value.

- B. ALTITUDE – Indication of altitude in the position data referred to in 9A is desirable.

10. COVERAGE

Coverage should be defined as: (1) truly global with the satellite providing service to and from any point on the globe; (2) Geostationary with complete global coverage except for the poles; (3) Geostationary with regional coverage, and; (4) Non-geostationary coverage with limitations of coverage. Areas where satellite communications are turned off to conserve power should not be included as a part of the "coverage".

11. SELECTIVE POLLING FOR POSITION

This is the ability for the RCC/PSAP to query a unit by its identity code for its position. Other data concerning the unit or its carrier might be considered as advantageous, but not as a requirement at this time. This enables emergency response or SAR personnel to determine the location of a party that is disabled or deceased.

12. DATA MESSAGE ALERTING TIME LESS THAN 5 MINUTES

This time is defined as the time from when a distress message is transmitted to when the PSAP or RCC is notified. It includes any waiting time for satellite coverage as well as any delays introduced by the system. The time taken to sort and route the messages to the PSAP or RCC can be considered negligible. This capability increases the probability of recovering survivors.

13. PRIORITY ACCESS FROM THE MOBILE TERMINAL

This provides the capability of the distress message to gain access ahead of lower priority communication channels when warranted. This does not necessitate preemption of in progress communications but can mean acquiring top priority in the message or call queue.

14. PRIORITY ACCESS TO THE MOBILE TERMINAL

This provides the capability for SAR personnel to gain access to the distressed party ahead of lower priority communication channels when warranted. This does not necessitate preemption of in progress communications but can mean acquiring top priority in the message or call queue.

15. INFORMATION AVAILABLE FROM MSS DATA BASE

The ability to contact someone else related to the distress party (family, friends or home office) can fulfill much of the same objective as call back. This information is expected to be available in the MSS registry as a home and/or office telephone number, and should be available to the SAR forces either with the distress alert or by access to the MSS provider's data base on a 24 hour basis. The type of information which would be valuable includes emergency contact, description of vessel or aircraft, type of equipment and primary use of equipment.

16. SITUATION SORT FOR DATA MESSAGES

The distress message should include information about the type of vehicle (e.g. ship, plane). This allows routing of distress messages to the appropriate responder (in the US: the Coast Guard or the Air Force) with a minimum of delay

17. MOBILE UNIT CALLER ID TO RESCUE CENTER

Caller ID is a desirable capability.

ATTACHMENT 2

SEARCH AND RESCUE AND DISASTER SUPPORT CAPABILITIES MATRIX FOR COMMERCIAL MOBILE SATELLITE SERVICES (CMSS) (POST ALERTING PHASE)

1. 2-WAY DATA AND/OR 2-WAY VOICE

This is intended to mean digital data transmitted and received via a data line or a voice link could also be used to transmit digital data. For voice, this does not limit the transmission method, which could be either analog or digital.

2. FACSIMILE

The ability of the MSS system to receive and transmit facsimile images with appropriate terminal equipment.

3. STILL IMAGES

The ability of the MSS system to receive and transmit a digitized version of a picture with appropriate terminal equipment.

4. VIDEO IMAGERY

The ability of the system to receive and transmit video images generated by a TV camera and encodes them to occupy the available bandwidth.

5. PSTN OR PSDN COMPATIBLE

The gateway or control center of the satellite system must provide the compatibility with the Public Switched Telephone Network and/or the Public Switched Data Network. A requirement for terminal equipment at the RCC/PSAP that is unique to the MSS system is not acceptable.

6. POSITION AVAILABLE AT MOBILE

- A. The requirement is to allow the MSS terminal user to determine his position relative to map coordinates as well as provide that location to headquarters or base station personnel via the MSS link.
- B. Indication of altitude in the position data referred to in 6A is desirable.

7A. TRANSMIT POSITION VIA MSS LINK

The position of mobile terminal is transmitted via the MSS link to RCC, PSAP or other receiving point.

7B. INCLUDE ALTITUDE?

Indication of altitude in the position data referred to in 7A is desirable.

8. POSITION ACCURACY 125m

This refers to the accuracy of the position specified in Item 6. Indication of altitude in the position data referred to in 6 is desirable.

9. SELECTIVE POLLING FOR POSITION

This is the ability for the RCC/PSAP to query a unit by its identity code for its position. Other data concerning the unit or its carrier might be considered as advantageous, but not as a requirement at this time. This enables emergency response or SAR personnel to determine the location of a party that is disabled or deceased.

10. BROADCAST

The ability of the MSS to select a set of terminals and provide a simultaneous message to the group of terminals addressed. This could be used to alert or recall emergency personnel in a given area.

11. CONFERENCE

The ability to set up conference calls to selected terminals on a private basis as different from a net call where everyone on the net has access.

12. COVERAGE

Coverage is defined as not only the area in view of the satellite system, but also the provision of communication services in the "coverage" areas. Coverage should be defined as (1) truly global with the satellite providing service to and from any point on the globe. (2) Geostationary with complete global coverage except for the poles. (3) Geostationary with regional coverage and (4) Non-geostationary coverage with limitations of coverage. Areas where satellite communications are turned off to conserve power should not be included as a part of the "coverage".

13. CALL BACK CAPABILITY

The ability to restore communications with another party when communications are lost. This does not imply automatic restoration of communications. A telephone number or data address is required.

14. PRIORITY ACCESS/LEVELS

This provides the capability to gain access ahead of lower priority communications when warranted. This does not necessitate pre-emption of in progress communications and can be accomplished by acquiring top position in the queue of channel requests. Indicate the number of levels of priority that can be provided.

15. VOICE ACCESS CONTROL

This is intended to avoid the problem of system saturation that often occurs in a disaster area. This capability would allow blocking of telephone calls to and from a disaster area when sufficient capacity is not available

16. 911 CALL CAPABILITY

This is intended to indicate the capability for the mobile unit to call an emergency 911 center (PSAP).

17. PROVIDE LOCATION AND IDENTIFICATION TO 911

The capability to provide location and identification information to the emergency 911 center (e.g. ALI and ANI).

18. DATA SERVICES; STORE AND FORWARD

The ability of the system to receive data from one location and deliver it to another location.

DESCRIPTION OF MSS SYSTEMS

American Mobile Satellite Corporation

American Mobile Satellite Corporation launched its first satellite into geostationary orbit on April 7, 1995. Since that time, American Mobile has been committed to delivering communication tools to organizations with remote or mobile operations. The satellite's footprint extends coverage over the continental United States, Alaska, Hawaii, the Caribbean, and more than two hundred miles of coastal waters. Public safety and emergency service agencies utilize American Mobile's SKYCELL[®] Satellite Dispatch Service and SKYCELL Satellite Communication Services for seamless voice communication in disaster and crisis situations.

SKYCELL dispatch is a real-time, voice-based service that offers digital broadcast dispatch capability. Dispatch service has two-way radio functionality and the reliability, security, and coverage only available with satellite communications. Customized talkgroups allow a dispatcher to simultaneously exchange information with an individual or a select group of workers, as well as support internal and interagency coordination and control.

American Mobile integrates SKYCELL dispatch with its satellite data, voice, and fax communication services. These services include telephone connectivity, e-mail and Internet access, and circuit-switched data transmission.

A variety of equipment and configuration options are available, including land mobile, fixed-site, and transportable applications. American Mobile is the exclusive provider of mobile satellite services in the L-band frequency (which eliminates rain fade and supplies coverage and service regardless of weather conditions) in the United States. For additional information, call 1/800-872-6222 or visit our web site at www.AmMobile.com.



COMSAT, using Inmarsat space segment, offers a wide array of capabilities to support Search and Rescue and Disaster Recovery operations in urban and rural areas on land, at sea and in the air. No other mobile satellite system -- existing or planned -- can match that claim in terms of operational scope and service capabilities.

COMSAT Services. COMSAT provides global, seamless coverage utilizing a four satellite (plus one in-orbit spare) configuration of state-of-the-art "Inmarsat 3" satellites operating at geosynchronous orbit. These recently launched spacecraft support six mobile earth station services (as illustrated in Tables 1C and 2C), ranging from the "Inmarsat A" and "Inmarsat B" services, which provide voice, telex, fax, high speed data and compressed TV capabilities, to the laptop "Planet 1" ("Mini-M") service, which provides voice, data, fax and video. Many of these services have position reporting and encryption capabilities. COMSAT supports these services through around-the-clock worldwide operations at land earth stations in Southbury, CT, Santa Paula, CA, and Kuantan, Malaysia.

Inmarsat Space Segment. The Inmarsat system is highly robust. The "Inmarsat 3" satellites provide overlapping coverage and are backed up by four fully operational "Inmarsat 2" satellites. This mix gives the user a variety of services from which to choose, as well as the option for receiving service, either in an on-demand mode or through full-period leases.

Public Safety Tradition. COMSAT's tradition in providing public safety communications can be traced back to the 1970's with the launching of the world's first MSS -- COMSAT General's "Marisat" system. This pioneer system was dedicated to maritime safety and commercial communications. A unique capability was introduced in the early ship earth stations (SESS) -- a "distress button" -- to insure the ship's captain of instantaneous communications with a Rescue Coordination Center when safety of life and property was at issue. Subsequently, the International Maritime Satellite Organization (Inmarsat), established in 1979, turned to leased "Marisat" satellites to provide a critical component of the new global satellite system's first generation space segment. Because of its demonstrated performance and capabilities, the International Maritime Organization (IMO) selected Inmarsat as the "backbone" communications element of the Global Maritime Distress and Safety System (GMDSS), including the "Inmarsat C" that supports "SafetyNET."

COMSAT's capabilities have evolved to meet the changing requirements of the public safety community. The maritime and land mobile satellite services are almost identical. Land mobile terminals, over the years, have been widely deployed by US disaster recovery and relief organizations, domestically and overseas, and by the Armed Forces in humanitarian missions.

Future. In mid-April 1999, Inmarsat became a commercial company. This restructuring will enhance the capabilities of COMSAT, the major shareholder in Inmarsat, to continue to efficiently and reliably support the Search and Rescue and Disaster Recovery communities.

For further information, call Director/Government Sales, COMSAT Mobile Communications: 1-800-685-7898 (CMC Sales); Fax: 1-301-214-7100 (Communication Center) or 301-214-7284 (CMC Sales); Internet: <http://www.comsat.com/cmc/>

THE ELLIPSO™ MOBILE PERSONAL COMMUNICATION SYSTEM

The ELLIPSO system falls into the group of satellite cellular service providers licensed by the FCC and generally referred to as Big-LEO systems. Others in the group include Iridium, Globalstar, ICO, and Constellation. The ELLIPSO systems main unique feature is its use of elliptic orbits; all the other systems use circular orbit constellations. The choice of elliptic orbits allows satellite coverage to be tailored to the market's telephone communications requirements. Much more capacity is needed in the daytime than at night-time, and more capacity is needed in the Northern Hemisphere than in the Southern Hemisphere. The ELLIPSO system uses 17 satellites to obtain near global coverage, compared with the larger numbers required for Iridium or Globalstar. It is somewhat more comparable to ICO, that uses circular MEO constellations, but ELLIPSO's orbits are lower and require considerably less launch energy (hence- smaller launch vehicle requirements).

Another characteristic of ELLIPSO is that it has typically considerably higher minimum and average elevation angles (from the user to the satellite) meaning that it is much less affected by multi-path, atmospheric or rain interference than the low altitude Big-LEOs. In the ELLIPSO system, there is no cross-linking between satellites, signals being transferred into the PSTN through a gateway ground control station (GCS) that generally covers a wide region. Independent studies have concluded that the ELLIPSO system enjoys the lowest cost per billable minute of any of the Big-LEO systems. The user terminals for ELLIPSO fall into three categories: hand-held, fixed, and mobile vehicular. It is contemplated that the ELLIPSO system will be well-suited to handle emergency and search and rescue type of telephone calls. The small, hand-held user terminal will be comparable to existing cell phones, offering the user convenience and portability. The user terminals will be dual-use; that is, they will selectively connect to a terrestrial cell phone tower where available (at a lower per minute user fee). If they are out of range of a ground terminal, they would then connect through an ELLIPSO satellite. The ELLIPSO system is scheduled to become operational at the beginning of 2002. Continuous service will be available even before all the satellites are in orbit, due to the incremental deployment of the first of three orbital planes – the equatorial MEO CONCORDIA™ sub-constellation. This constellation is intended to provide service to the tropical regions and the Southern Hemisphere. However, it is capable of serving either Northern or Southern Hemisphere up to approximately 55 degrees of latitude. The other two planes

comprise the BOREALIS™ sub-constellation, that provide higher latitude Northern Hemisphere coverage and extra capacity in the Northern Hemisphere. ELLIPSO's designers have obtained patents on their unique constellations and orbits. In any of the three planes (the two sun-synchronous BOREALIS and the single equatorial CONCORDIA), the coverage can be tailored to provide augmented daytime coverage (compared to night-time) to better meet the needs of the average telephone customer. Partners with ELLIPSO, Inc., in the implementation of the ELLIPSO system include the Boeing Company, Lockheed-Martin, L3-Comm, Arianespace, and the Harris Corporation.



Leo One is a constellation of 48 low-Earth orbiting satellites designed to provide high quality, ubiquitous coverage on a worldwide basis. One or more satellites will virtually always be in view of a user.

Leo One is a store-and-forward data communications system supporting subscriber data rates of up to 9,600 bps for the uplink and 24,000 bps for the downlink. The communications links operate in the VHF and UHF frequency bands thus benefiting from superior propagation characteristics while enabling the production of low cost user equipment.

The Leo One system is designed to support Search and Rescue requirements and is uniquely optimized to provide a world-wide, near-real-time communications capability. Communications are two-way with Message Confirmation, Selective Polling, Priority Access, inherent Situation Sorting, and much more. GPS positioning will also be supported.

Leo One expects to launch its first satellites in 2000 with the commercial service commencing in 2001. The full constellation will be operational in the second quarter of 2002. For further information please visit Leo One at www.leoone.com.

Leo One Satellites

Number	48, plus spares		
Planes	8, with 6 satellites equally spaced per plane		
Inclination	50°		
Altitude	950 km		
Design life	5 years, with 7 years of consumables		
Frequencies	Subscriber uplink	148-150.05 MHz	
		2.4 to 9,6 kbps	
		Subscriber downlink	137-
	138, 400.15-401 MHz	24 kbps	
MHz		Gateway uplink	148-150.05
		50 kbps	
MHz		Gateway downlink	400.15-401
		50 kbps	

LISTING OF WEB PAGES FOR ADDITIONAL MSS PROVIDERS

MSS Provider

Web Page

Final Analysis

www.finalanalysis.com

Globalstar

www.globalstar.com

ICO

www.ico.com

INMARSAT

www.inmarsat.org

Iridium

www.iridium.com

ORBCOMM

www.orbcomm.com

Planet One

Table 1A
GEO and Big LEO MSS Distress Alerting
and Locating Capabilities

4/16/99

Capabilities	AMSC Available Now	ELLIPSO Available 4Q 2002	GLOBALSTAR Available 1Q 1999	ICO Available 2000	IRIDIUM Available 3Q 1998
1a. 2-Way Data or 2-Way Voice 1b. Maximum Data Speed	Both 4800 bps	Both 9600 bps	Both 9600 bps	Both 9600 bps	Both 2400 bps
2. PSTN or PSDN Compatible	Both	Both	Both	Both	Both
3. Emergency Message Capability Manual or Automatic?	Yes Dial 911 or ERS	TBD	Yes, Dial 911	Yes, Dial 911	Yes, Dial 911
4. Data Message Confirmation	Yes	TBD	Not Decided	Yes	N/A for Voice
5. Data Message Accountability	Yes	TBD	Not Initially	Yes	N/A for Voice
6. Call Back Capability	Yes	SS7	Not Initially	Yes	Yes
7. Connectivity A. Voice B. Data	Yes, AMSC Operators	TBD	Yes, through Gateway	Yes	911 Routing Or GSM
8a. Position Available to Rescue Center 8b. In Future?	Optional w/GPS Now	Yes 2001	Yes After 2000	Yes/GPS 3Q 2000	No No
9a. Position Accuracy 125m 9b. Altitude?	GPS No	100 Meters Yes	10 Km (1) No	100 Meters No	N/A N/A
10. Coverage and Service Total Global; GEO Global; GEO Regional; Non-GEO Limits Provide Limitations	GEO Regional	Non-GEO Limits			Total Global
11. Selective Polling for Position	Yes	Yes	Yes	Yes	Yes
12. Alerting Time Less than 5 Minutes	Yes	TBD	Yes	Yes	N/A for Voice
13. Priority Access from Mobile Preemption?	Yes	TBD	Yes	Yes	Yes
14. Priority Access to Mobile Preemption?	Yes	TBD	No	TBD	No
15. Information Available from MSS Data Base	Yes	TBD	Yes	TBD	No
16. Situation Sort for Data Messages (Plane, Ship)	Yes	TBD	Yes	Yes	No
17. Mobile Unit Caller ID to Rescue Center When?	TBD	2Q 2001	Yes 1Q 1999	Yes, System Activation Date	Yes, System Activation Date

Notes:

(1) System has capability for higher accuracy up to 300 meters which could be implemented in the future.

* According to ITU regulations and CFR 47, distress communications in the aeronautical and maritime areas require preemption and no cost communications in the maritime area.

Table 1B
Little LEO MSS Distress Alerting
and Locating Capabilities

Capabilities	Final Analysis Communication Services Available 4 Q. 2000	LEO One USA Available 4Q 2000	ORBCOMM Available Now
1a. 2-Way Data and/or 2-Way Voice b. Maximum Data Speed	2-Way Data 19.2 kbps (1)	2-Way Data 9600 bps up 24K bps down	2-Way Data 2400 bps
2. PSTN or PSDN Compatible	PSDN	Both	PSDN
3. Emergency Message Capability How Used?	Yes- User Activated or Event Activated (2)	Yes, Routing TBD	Yes, Routing TBD
4. Data Message Confirmation	Yes	Yes	Yes
5. Data Message Accountability	Yes	Yes	Yes
6. Call Back Capability	Yes	Yes	Yes
7. Connectivity			
a. Voice	N/A	N/A	N/A
b. Data	Yes	Yes	Yes, Under Development
8a. Position Available to Rescue Center b. In Future?	Yes/GPS Yes	Yes Yes with GPS	Yes At System Startup
9a. Position Accuracy 125m b. Altitude?	Yes/GPS Yes	35 Meters Yes with GPS	GPS Yes
10. Coverage with Service Total Global; GEO Global; GEO Regional; Non-GEO W/Limits Provide Coverage Limitations		Total Global	Total Global
11. Selective Polling	Yes	Yes	Yes
12. Alerting Time Less than 5 Minutes	Yes with some Exceptions	Yes	Yes
13. Priority Access from Mobile Preemption?	Yes	Yes	Yes
14. Priority Access to Mobile Preemption?	Yes	Yes	Yes, Under Development
15. Point of Contact Available from MSS Data Base	Yes	Yes	Possible
16. Situation Sort (Plane, Ship) Mobile Unit Caller ID to Rescue Center	N/A	N/A	N/A

Notes: When? (1) 19.2 kbps up and down for mobile service; 300 kbps for fixed service (future)
(2) Issues broadcast to receivers within 5000 Km radius as well as to emergency center

Table 1C
COMSAT Distress Alerting
and Locating Capabilities

Capabilities	INMARSAT A&B Available Now	COMSAT AERO Available Now	INMARSAT C Available Now	INMARSAT M Available Now	Planet One Available now
1a. 2-Way Data or 2-Way Voice 1b. Maximum Data Speed	Both 64 kbps	Both 2.4 kbps (3)	Data Only 600 bps (5)	Both 2.4 kbps	Both 2.4 kbps
2. PSTN or PSDN Compatible	Both	Both	Both	Both	Both
3. Emergency Message Capability How Used (1)	Yes	Yes	Yes	Yes	Yes
4. Message Confirmation	Yes	Yes	Yes	Yes	Yes
5. Message Accountability	Yes	Yes	Yes	Yes in Maritime	Yes
6. Call Back Capability	Yes	Yes	Yes	Yes	Yes
7. Connectivity A. Voice B. Data	Yes	Yes(4)	Yes (4)	Yes	Yes
8a. Position Available to Rescue Center 8b. In Future?	Yes Now	Yes Now	Yes/GPS Now	Yes Now	Yes Now
9a. Position Accuracy 125m 9b. Altitude?	Yes (6) Yes (6)	GPS Yes	GPS Yes (6)	Yes (6) Yes (6)	Yes (6) Yes (6)
10. Coverage and Service Total Global; GEO Global; GEO Regional; Non-GEO W/Limits Provide Limitations	GEO Global	GEO Global	GEO Global	GEO Global	GEO Global (Spot Beams)
11. Selective Polling	No	Yes	Yes	No	No
12. Alerting Time Less than 5 Minutes	Yes	Yes	Yes	Yes	Yes
13. Priority Access from Mobile Preemption?	Yes/Maritime No/Land Mob.	Yes	Yes/Maritime No/Land Mob.	Yes/Maritime No/Land Mob.	No
14. Priority Access to Mobile Preemption?	Yes/Maritime No/Land Mob.	Yes	Yes/Maritime No/Land Mob.	Yes/Maritime No/Land Mob.	Yes
15. Information Available from MSS Data Base	Yes	Yes	Yes	Yes	Yes
16. Situation Sort (Plane, Ship)	Yes	Yes	Yes	Yes	Yes
17. Mobile Unit Caller ID to Rescue Center When?	Yes (2)	Yes (2)	Yes (2)	Yes (2)	Yes (2)

Notes:

- (1) All terminals have emergency prefix codes
- (2) If RCC is equipped with FGD Signaling; otherwise through LES inquiry
- (3) 9.6 kbps for fax, packet data 4.8 kbps
- (4) To flight information regions or RCCs using table driven addressing
- (5) 2-way data/store and forward
- (6) Dependent on input from navigation system

Table 2A
GEO and Big LEO MSS Post-Alert Phase
Capabilities Comparison

4/16/99

Capabilities	AMSC Available Now	ELLIPSO Available 4Q 2002	GLOBALSTAR Available 1Q 1999	ICO Available 2000	IRIDIUM Available 3Q 1998
1. 2-Way Data and/or 2-Way Voice	Both	Both	Both	Both	Both
2. Facsimile	Yes	Yes	Yes	Yes	Yes
3. Still Images	Yes	Yes	Yes	Yes/TBD	Yes
4. Video Imagery	Yes	No	Planned 2005	Yes/TBD	No
5. PSTN Compatible or PSDN Compatible	Both	PSDN In 2002	Both	Both	Both
6a. Position Available at Mobile	Option-GPS	Yes-GPS	Yes	Yes-GPS	No
6b. Include Altitude?	No	Yes	No	No	No
7a. Transmit Position Via MSS Link	Yes-GPS	Yes	Yes	Yes	Yes
7b. Include Altitude?	No	Yes	No	No	Yes
8. Position Accuracy 125m? Altitude?	Option W/GPS	Yes W/GPS	Yes (2) Yes (2)	Yes GPS No	No No
9. Selective Polling	Yes	Yes	2000	Yes	Yes (3)
10. Broadcast	Yes	Yes	2000	TBD	Yes
11. Conference	Yes	Yes	Yes	Yes	Yes
12. Coverage and Service Total Global; GEO Global; GEO Regional; Non-GEO W/Limits Provide Limitations	GEO Global	Non-GEO W/Limits	Non-GEO W/Limits	Total Global	Total Global
13. Call Back Capability	Yes	Yes	2000	Yes	Yes
14. Priority Access/Levels Voice/Levels/Preemption? Data/Levels/Preemption?	Yes/8	2002/5	Yes/10	Yes/9	Yes/15
15. Access Control	Yes	TBD	Yes	Yes	Yes
16. 911 Call Capability	Yes	Yes	Yes	Yes	Yes
17. Provide Location and Identification to 911	Option GPS (1)	2002	Yes	Yes	Yes
18. Data Services Store and Forward?	Option	No	Yes	Yes	No

Notes: (1) ID Available; Location Optional
(2) Not Always
(3) Not Including Altitude

Table 2B
Little LEO MSS Post-Alert
Phase Capabilities Comparison

Capabilities	Final Analysis Communication Services Available 4Q 2000	LEO ONE Available 4Q 2000	ORBCOMM Available Now
1. 2-Way Data and/or 2-Way Voice	Both (1)	2-Way Data	2-Way Data
2. Facsimile	Limited	Limited	No
3. Still Images	Limited	Limited	No
4. Video Imagery	No	No	No
5. PSTN Compatible or PSDN Compatible	Both	Both	PSDN
6a. Position Available at Mobile	Yes/GPS	Yes/GPS	Yes/GPS
6b. Include Altitude?	Yes	Yes/GPS	Yes/GPS
7a. Transmit Position via MSS Link	Yes	Yes	Yes/GPS
7b. Include Altitude?	Yes	Yes	Yes
8. Position Accuracy 125m? Altitude?	Yes Yes	Yes/GPS YES	Yes/GPS
9. Selective Polling	Yes	Yes	Yes
10. Broadcast	Yes	Yes	Yes
11. Conference	Yes	Yes	No
12. Coverage and Service Total Global; GEO Global; GEO Regional; Non-GEO W/Limits (Provide Limitations)		Total Global	Total Global
13. Call Back Capability	Yes	Yes	Yes
14. Priority Access/Levels Voice/Levels Preemptive? Data/Levels/Preemptive?	N/A YES/3/?	N/A Yes/32/Yes	N/A Yes/4/?
15. Access Control (Voice)	N/A	N/A	N/A
16. 911 Call Capability	N/A	N/A	N/A
17. Provide Location and Identification to 911	N/A	N/A	N/A
18. Data Services Store and Forward?	Yes	Yes	Yes

Table 2C
COMSAT Post-Alert
Phase Capabilities

Capabilities	<i>INMARSAT A&B Available Now</i>	<i>COMSAT AERO Available Now</i>	<i>INMARSAT C Available Now</i>	<i>INMARSAT M Available Now</i>	<i>Planet One Available Now</i>
1. 2-Way Data and/or 2-Way Voice	Both	Both	2-Way Data	Both	Both
2. Facsimile	Yes	Yes	Yes	Yes	Yes
3. Still Images	Yes	Yes	Yes	Yes	Yes
4. Video Imagery	Yes	Yes	No	Yes	Yes
5. PSTN Compatible or PSDN Compatible	Both	Both	Both	Both	Both
6a. Position Available at Mobile	Yes	Yes	Yes	Yes	Yes
6b. Include Altitude?	Yes (2)	Yes	Yes (2)	Yes (2)	Yes (2)
7a. Transmit Position Via MSS Link	Yes	Yes	Yes	Yes	Yes
7b. Include Altitude?	Yes (2)	Yes	Yes (2)	Yes (2)	Yes (2)
8. Position Accuracy 125m? Altitude?	Yes (2)	Yes	Yes (2)	Yes (2)	Yes (2)
9. Selective Polling	Yes	Yes	Yes	Yes	Yes
10. Broadcast	Yes	Yes	Yes	Yes	Yes
11. Conference	Yes	Yes	No	Yes	Yes
12. Coverage and Service Total Global; GEO Global; GEO Regional; Non-GEO W/Limits Provide Limitations	GEO Global	GEO Global	GEO Global	GEO Global	GEO Global (Spot Beams)
13. Call Back Capability	Yes	Yes	Yes	Yes	Yes
14. Priority Access/Levels (3) Voice/Levels/Preemptive? Data/Levels/Preemptive?	Yes/4 (1)	Yes/4	Yes/4 (1)	Yes/4 (1)	Yes/3
15. Access Control	Yes	Yes	Yes	Yes	Yes
16. 911 Call Capability	Yes (4)	Yes (4)	Yes (4)	Yes (4)	Yes (4)
17. Provide Location and Identification to 911	Yes (4)	Yes (4)	Yes (4)	Yes (4)	Yes (4)
18. Data Services Store and Forward?	No	No	Yes	No	No

Notes:

- (1)
 (2)
 (3)
 (4)

Maritime only
 Dependent on input from navigation system
 Priority access in maritime and aeronautical areas includes preemption
 Operator at Earth Station can dial 911 to forward call and provide
 location and identification information

Attachment 2

IMO Criteria for Use when Providing Inmarsat Shore-based Facilities

ASSEMBLY
19th session
Agenda item 10

RESOLUTION A.801(19)
adopted on 23 November 1995

**PROVISION OF RADIO SERVICES FOR THE GLOBAL MARITIME
DISTRESS AND SAFETY SYSTEM (GMDSS)**

THE ASSEMBLY,

RECALLING Article 15(j) of the Convention on the International Maritime Organization concerning the functions of the Assembly in relation to regulations and guidelines concerning maritime safety,

RECALLING ALSO that regulation IV/5 of the International Convention for the Safety of Life at Sea (SOLAS), 1974 as amended in 1988, requires each Contracting Government to undertake to make available, either individually or in co-operation with other Contracting Governments, as they may deem practical and necessary, appropriate shore-based facilities for terrestrial and space radio services having due regard to the recommendations of the Organization,

RECALLING FURTHER that the Inmarsat system provides for radiocommunication services, including those for distress and safety, utilizing geostationary satellites in the 1.5 and 1.6 GHz band,

NOTING that the COSPAS-SARSAT system provides for the reception of distress alerts on the frequency 406 MHz utilizing polar orbiting satellites,

NOTING ALSO that regulation IV/5 of the 1974 SOLAS Convention requires the following radio services to be provided:

- a radiocommunication service utilizing geostationary satellites in the maritime mobile satellite service,
- a radiocommunication service utilizing polar orbiting satellites in the mobile satellite service,
- the maritime mobile service in the bands between 156 MHz and 174

MHz,

- the maritime mobile service in the bands between 4,000 kHz and 27,500 kHz, and
- the maritime mobile service in the bands 415 kHz to 535 kHz and 1,605 kHz to 4,000 kHz,

NOTING FURTHER that the provision contained in paragraph 5.1.1 of the Annex to the International Convention on Maritime Search and Rescue, 1979, requires that Parties shall ensure that such continuous radio watches as are deemed practicable and necessary are maintained on international distress frequencies,

TAKING INTO ACCOUNT the resolutions of the World Administrative Radio Conference for Mobile Services, 1987, in particular resolution 331(Mob-87) relating to the introduction of provisions for the Global Maritime Distress and Safety System (GMDSS) and the continuation of the existing distress and safety provisions, and resolution 322(Rev.Mob-87) relating to coast stations and coast earth stations assuming watchkeeping responsibilities on certain frequencies in connection with the implementation of distress and safety communications for the Global Maritime Distress and Safety System (GMDSS),

TAKING INTO ACCOUNT ALSO resolution 3 "Recommendation on the early introduction of the Global Maritime Distress and Safety System (GMDSS) elements", adopted by the 1988 GMDSS Conference,

CONSIDERING that the GMDSS will use digital selective calling equipment operating in the MF, HF and VHF bands,

CONSIDERING ALSO that ships should not be required to install equipment intended primarily for ship/shore communication functions when operating in areas where no corresponding shore-based facilities are available,

CONSIDERING FURTHER that it is necessary to provide radio services for transmission and reception of distress and safety communications and that not all coast stations will be obliged to provide for such distress and safety communications,

HAVING CONSIDERED the recommendation made by the Maritime Safety Committee at its sixty-third session,

1. ADOPTS the Recommendation on Provision of Radio Services for the GMDSS, the Criteria for Use when Providing Shore-Based Digital Selective Calling (DSC) Facilities for Use in the GMDSS, the Criteria for Establishing GMDSS Sea Areas, the Criteria for Use when Providing a NAVTEX Service and the Criteria for Use when Providing Inmarsat Shore-Based Facilities for Use in the GMDSS set out respectively in Annexes 1, 2, 3, 4 and 5 to the present resolution;
2. RECOMMENDS that Governments undertake, as a matter of urgency, a review of the need to provide shore-based facilities to support the GMDSS and to make available, either individually or in co-operation with other Governments, adequate shore-based facilities for terrestrial and space radio services deemed practicable and necessary;
3. URGES Governments to provide, either individually or in co-operation with other Governments, the radio services deemed practicable and necessary for the proper operation of the GMDSS;
4. INVITES Governments and organizations concerned to inform the Secretary-General of radio facilities to be provided in support of the GMDSS in response to this resolution;
5. REQUESTS the Maritime Safety Committee to keep this resolution under review and to adopt amendments thereto, as necessary;
6. REVOKES resolution A.704(17).

ANNEX 1

RECOMMENDATION ON PROVISION OF RADIO SERVICES FOR THE GMDSS

1 Governments should establish such coast stations, individually or in co-operation with other Governments, as are needed to designate a sea area or areas A1 or A2, or both, off their coasts. Each sea area should be established in accordance with the criteria for establishing GMDSS areas recommended in Annex 3.

2 Areas not defined by Governments as sea areas A1 or A2 will, as appropriate, be designated as sea areas A3 or A4 in accordance with regulations IV/2.14 and IV/2.15 of the 1974 SOLAS Convention, as amended in 1988.

3 Each Government should submit to the Organization information on the sea area or sea areas A1, A2 and A3, NAVTEX and/or international SafetyNET service areas it has established for the GMDSS and on any changes which may affect the sea area or areas it has so defined.

4 Governments, taking into account Annex 2, should, as appropriate, make provision for radiocommunications in each sea area A1 or A2 they have defined and, in addition, Governments are invited to provide for radiocommunications in sea areas A3 or A4, as appropriate, for the purposes of:

- .1 reception of ship-to-shore distress alerting; in particular, facilities for receiving distress alerts on the frequency 406 MHz are urgently needed in the southern hemisphere;
- .2 transmission of shore-to-ship distress alerting;
- .3 transmission and reception of search and rescue co-ordinating communications;
- .4 transmission and reception of navigational and meteorological warnings and urgent information; and
- .5 transmission and reception of general radiocommunications.

ANNEX 2

CRITERIA FOR USE WHEN PROVIDING SHORE-BASED DIGITAL SELECTIVE CALLING (DSC) FACILITIES FOR USE IN THE GMDSS

1 Governments desiring to provide an HF coast station facility for use in the GMDSS should notify the Organization of their intention so that the Organization can maintain and circulate a complete list of stations providing HF DSC distress watch. Governments should ensure that such shore-based HF DSC facilities are provided in accordance with the criteria contained in Appendix 1.

2 Governments, individually or in co-operation with other Governments within a specific SAR region, desiring to provide MF coast station DSC facilities serving, either wholly or in part, a particular sea area A2, should notify the Organization as to the extent of continuous coverage and the extent of coverage from shore. This information should be determined by Governments in accordance with the Criteria for Establishing GMDSS Sea Areas contained in Annex 3. Governments should ensure that shore-based MF coast station DSC facilities providing part of this sea area A2 coverage, are provided in accordance with appendix 2.

3 Governments, individually or in co-operation with other Governments within a specific SAR region, desiring to provide VHF coast station DSC facilities serving, either wholly or in part, a particular sea area A1, should notify the Organization as to the extent of continuous coverage and the extent of coverage from shore. This information should be determined by Governments in accordance with the criteria contained in Annex 3. Governments should ensure that shore-based VHF coast station DSC facilities providing part of this sea area A1 coverage, are provided in accordance with Appendix 3.

4 The Organization should maintain a master plan of all sea areas covered by MF and VHF coast station DSC facilities and should periodically circulate an updated copy of the description of such sea areas to Governments.

APPENDIX 1

1 BASIC PRINCIPLES FOR ESTABLISHING HF DSC COAST STATIONS FOR SEA AREAS A3 AND A4

The selection of HF DSC coast stations for sea areas A3 and A4 should be based on the following principles:

- .1 each ocean area requiring HF guard should have a minimum of two stations to provide the required HF cover;
- .2 where practicable, stations should be selected on opposite sides of an ocean area; and
- .3 in ocean areas of high traffic density, e.g. the North Atlantic, more than two stations should be provided.

2 CRITERIA FOR THE SELECTION OF HF DSC STATIONS

Stations participating in HF DSC watchkeeping in the GMDSS should:

- .1 be affiliated to an RCC and have reliable communications by telephone and telex;
- .2 have long-range HF communication capability in all HF bands;
- .3 monitor all HF DSC distress frequencies in order to avoid the multiplication of communications links between RCCs which would be required if several stations divided the watchkeeping on different frequencies;
- .4 provide as complete a coverage of their ocean area as possible;
- .5 be in continuous operation; and
- .6 be able to relay communications under a common procedure.

3 AVAILABILITY OF PARTICIPATING HF STATIONS

The minimum number of coast stations indicated in 1.1 for any given ocean area may need to be adjusted in future in order to:

- .1 provide full back-up in the event of operational failure; and
- .2 confirm full HF coverage as a result of future tests.

APPENDIX 2

1 BASIC PRINCIPLES FOR ESTABLISHING SEA AREA A2

The selection of MF DSC coast stations for sea area A2 should be based on the following principles:

- .1 each sea area designated as A2 requires a continuous MF guard on the distress frequencies and a sufficient number of coast stations to provide MF coverage in the coastal area of the Government concerned; and
- .2 in certain areas, several Governments may collectively provide complete coverage (e.g., the North Sea).

2 CRITERIA FOR PROVISION OF MF DSC STATIONS

Stations participating in MF DSC watchkeeping in the GMDSS should:

- .1 be affiliated to an RCC and have reliable communications by telephone and telex;
- .2 have medium-range MF capability;
- .3 provide as complete a coverage of their immediate sea area as possible; and
- .4 be in continuous operation.

APPENDIX 3

1 BASIC PRINCIPLES FOR ESTABLISHING SEA AREA A1

The selection of VHF DSC coast stations for sea area A1 should be based on the following principles:

- .1 each sea area designated as A1 requires a continuous VHF guard and should have the minimum number of stations necessary to provide VHF coverage in the coastal area of the Government concerned; and
- .2 in certain areas, several Governments may collectively provide complete coverage along their coasts (e.g. the North Sea).

2 CRITERIA FOR THE PROVISION OF VHF DSC STATIONS

Stations participating in VHF DSC watchkeeping in the GMDSS should:

- .1 be affiliated to an RCC and have reliable communications by telephone and telex;
- .2 have short-range VHF capability;
- .3 provide as complete a coverage of their immediate sea area as possible; and
- .4 be in continuous operation.

ANNEX 3

CRITERIA FOR ESTABLISHING GMDSS SEA AREAS

1 INTRODUCTION

It is intended that Governments should use the following criteria as guidance when determining the four mutually exclusive sea areas off their coasts, which are defined in regulations IV/2.12, IV/2.13, IV/2.14 and IV/2.15 of the 1974 SOLAS Convention, as amended in 1988.

2 SEA AREA A1

2.1 General

The communication range of stations operating in the maritime mobile VHF band is likely to be limited by propagation factors rather than lack of radiated power.

2.2 Guidance criteria

Sea area A1 is that sea area which is within a circle of radius A nautical miles over which the radio propagation path lies substantially over water. The radius A is equal to the transmission distance between a ship's VHF antenna at a height of 4 m above sea level and the antenna of the VHF coast station which lies at the centre of the circle.

2.3 Determination of radius A

2.3.1 The following formula should be used to calculate the range A in nautical miles:

$$A = 2.5(\sqrt{H \text{ (in metres)}} + \sqrt{h \text{ (in metres)}})$$

H is the height of the coast station VHF receiving antenna and h is the height of the ship's transmitting antenna which is assumed to be 4 m.

2.3.2 The following table gives the range in nautical miles (nm) for typical values of H:

2.3.3 The formula given above applies to line-of-sight cases but is not considered adequate for cases where both antennae are at a low level. The VHF range in sea area A1 should be verified by field strength measurements.

3 SEA AREA A2

3.1 General

3.1.1 Consideration of the reception of radio signals in the 2 MHz band indicates that the range is likely to be limited by propagation conditions and atmospheric noise, which are affected

by variations in geographical position and time of day, as well as radiated power.

3.1.2 The theoretical distance to be expected from ground wave propagation can be determined by reference to the "Ground-wave propagation curves: Sea Water" in Recommendation ITU-R PN.368-7, adjusted as necessary to take account of the actual radiated field strength from the transmitting antenna and the minimum field strength necessary for the proper operation of a receiver conforming with resolution A.804(19).

3.1.3 The determination of the minimum signal level required for satisfactory radio reception in the absence of other unwanted signals necessitates taking account of the noise with which the wanted signal must compete. ITU-R Report 322 gives the world distribution of values of noise level and of other noise parameters and shows the method of using these in the evaluation of the probable performance of a radio circuit.

3.2 Guidance criteria

Sea area A2 is that sea area which is within a circle of radius B nautical miles over which the propagation path lies substantially over water and which is not part of any sea area A1, the centre of the circle being the position of the coast station receiving antenna.

3.3 Determination of radius B

The radius B may be determined for each coast station by reference to Recommendation ITU-R PN.368-7 and ITU-R Report 322 for the performance of a single sideband (J3E) system under the following conditions:

Frequency	- 2,182 kHz
Bandwidth	- 3 kHz
Propagation	- ground wave
Time of day	-
Season	- *
Ship's transmitter power (PEP)	- 60 W**
Ship's antenna efficiency	- 25%
S/N (RF)	- 9 dB (voice)
Mean transmitter power	- 8 dB below peak power
Fading margin	- 3 dB

The range of sea area A2 should be verified by field strength measurements.

4 AREA A3

*Administrations should determine time periods and seasons appropriate to their geographic area based on prevailing noise level.

**See footnote to regulation IV/16(c)(i) of the 1981 amendments to the 1974 SOLAS Convention.

Guidance criteria

Sea area A3 is that sea area of the world not being part of any sea area A1 or A2 within which the elevation angle of an Inmarsat satellite is 5° or more.

5 AREA A4

Guidance criteria

Sea area A4 is that sea area of the world not being part of any seas area A1, A2 or A3.

ANNEX 4

CRITERIA FOR USE WHEN PROVIDING A NAVTEX SERVICE

1 There are two basic areas which must be defined when establishing a NAVTEX service. They are:

Coverage area: An area defined by an arc of a circle having a radius from the transmitter calculated according to the method and criteria given in this Annex.

Service area: A unique and precisely defined sea area, wholly contained within the coverage area, for which MSI is provided from a particular NAVTEX transmitter. It is normally defined by a line which takes full account of local propagation conditions and the character and volume of information and maritime traffic patterns in the region.

2 Governments desiring to provide a NAVTEX service should use the following criteria for calculating the coverage area of the NAVTEX transmitter they intend to install, in order to:

- determine the most appropriate location for NAVTEX stations having regard to existing or planned stations;
- avoid interference with existing or planned NAVTEX stations; and
- establish a service area for promulgation to seafarers.

3 The ground-wave coverage may be determined for each coast station by reference to Recommendation ITU-R PN.368-7 and ITU-R Report 322 for the performance of a system under the following conditions:

Frequency	- 518 kHz
Bandwidth	- 500 Hz
Propagation	- ground wave
Time of day	- ¹
Season	- 1
Transmitter power	- ²

¹Administrations should determine time periods in accordance with NAVTEX time transmission table (NAVTEX Manual, figure 3) and seasons appropriate to their geographic area based on prevailing noise level.

²The range of a NAVTEX transmitter depends on the transmitter power and local propagation conditions. The actual range achieved should be adjusted to the minimum required for adequate reception in the NAVTEX area served, taking into account the needs of ships approaching from other areas. Experience has indicated that the required range of 250 to 400 nautical miles (nm) can generally be attained by transmitter power in the range between

Antenna efficiency	-	2
RF S/N in 500 Hz band width	-	8 dB ³
Percentage of time	-	90

4 Full coverage of NAVTEX service area should be verified by field strength measurements.

100 and 1,000 W during daylight with a 60% reduction at night.

³Bit error rate 1×10^{-2} .

ANNEX 5

CRITERIA FOR USE WHEN PROVIDING INMARSAT SHORE-BASED FACILITIES FOR USE IN THE GMDSS

- 1 Governments desiring to provide an Inmarsat coast earth station facility for use in the GMDSS should notify the Organization of their intention so that the Organization can maintain and circulate a complete list of stations providing distress watch. Governments should ensure that such shore-based facilities are provided in accordance with the criteria contained in appendix.
- 2 Governments, individually or in co-operation with other Governments within a specific SAR region, desiring to provide Inmarsat coast earth station facilities serving, either wholly or in part, particular sea areas, should notify the Organization as to the extent of continuous coverage and the extent of coverage from shore. This information should be determined by Governments in accordance with the Criteria for Establishing GMDSS Sea Areas contained in Annex 3 to the present resolution.
- 3 The Organization should maintain in the GMDSS Master Plan details of all sea areas covered by Inmarsat coast earth station facilities and should periodically circulate an updated copy of the description of these sea areas to Governments.
- 4 Governments having coast earth stations participating in the GMDSS should ensure that those stations conform with these criteria specified in 2 of the appendix to this Annex and ensure that only those stations are listed in the GMDSS Master Plan.

APPENDIX

1 BASIC PRINCIPLES FOR ESTABLISHING INMARSAT COAST EARTH STATIONS FOR GMDSS SERVICES

1.1 The selection of Inmarsat coast earth stations for GMDSS services should be based on the following principle:

each ocean area requiring guard should have a minimum of two coast earth stations to provide the required cover for each system.

1.2 The minimum number of coast earth stations indicated in 1.1 for any given ocean area may need to be adjusted in future in order to provide full back-up in the event of operational failure.

2 CRITERIA FOR INMARSAT COAST EARTH STATIONS

2.1 Inmarsat coast earth stations participating in the GMDSS should:

- .1 meet the Inmarsat Technical Requirements confirmed by Inmarsat type acceptance and commissioning tests;
- .2 operate in compliance with the Inmarsat system operating procedures (SOP) for distress alerting and distress communications;
- .3 have a registered associated RCC and have reliable communications by telephone, telex, or other means;
- .4 be in continuous operation; and
- .5 support the following GMDSS communications functions:
 - .5.1 ship-to-RCC distress alerting preferably by a dedicated link;
 - .5.2 RCC-to-ship(s) distress alert relay preferably by a dedicated link;
 - .5.3 RCC-to-RCC co-ordinating communications by using SES terminals;
 - .5.4 transmit maritime safety information (Inmarsat-C only); and
 - .5.5 receiving maritime safety information.

2.2 Stations with store-and-forward systems should:

- .1 make an initial attempt to deliver a ship-to-shore or shore-to-ship message within 60 seconds for any distress alert or traffic, and

10 minutes for all other safety messages, from the time the receiving station receives the message;

- .2 generate the notification of non-delivery immediately once the message is considered non-deliverable; and
- .3 activate an aural/visual alarm to alert a designated responsible person if the distress traffic cannot be forwarded within the criteria of paragraph 2.2.1.

2.3 Stations with circuit switching systems should immediately attempt to deliver a ship-to-shore or shore-to-ship distress alert or traffic.

2.4 Stations should:

- .1 be capable of recognizing distress alerts in the ship-to-shore direction;
- .2 be capable of recognizing the following categories of priorities in both the ship-to-shore and shore^{*}-to-ship direction:

Maritime distress,

All other maritime (urgency, safety and routine); and

- .3 ensure the avoidance of degradation of, or obstructions to, urgency and safety maritime communications by employing four levels of priority in the shore-to-ship and ship-to-shore directions, by differentiating non-maritime from maritime communications or by other means established by Inmarsat.

^{*}Registered GMDSS service provider.